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July 27, 2015

The Honorable George B. Daniels  
U.S. District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
Room 1310  
500 Pearl St.  
New York, NY 10007-1312

**Re: July 28, 2015 Motions Hearing; Sokolow v. Palestine Liberation Organization,  
et al., No. 1:04-cv-0397 (GBD)**

Dear Judge Daniels:

On behalf of the Palestinian Authority ("PA") and Palestine Liberation Organization ("PLO"), we write in response to two letters: (1) Plaintiffs' July 21, 2015 letter (Dkt. #935), proposing an agenda for tomorrow's oral argument on all open motions; and (2) the July 27, 2015 letter from the United States Department of Justice (Dkt. #940), requesting that the Court defer ruling on the PA/PLO Rule 62 Motion for Stay Execution of the Judgment and to Waive the Bond Requirement ("Rule 62 Motion") (Dkt. #897), pending a decision by the United States whether to submit a Statement of Interest.

First, Plaintiffs' July 21 letter omits all reference to the PA and PLO's July 16 application (Dkt. #932) to strike or, alternatively for leave to respond to, Plaintiffs' untimely and unauthorized July 13 filing of extensive sur-reply papers opposing the Rule 62 Motion.<sup>1</sup> Regarding that alternative request, the PA and PLO asked the Court to allow the PA and PLO time to submit responsive papers addressing the Plaintiffs' unauthorized sur-reply before ruling on the Rule 62 Motion. The Court has not yet ruled on the PA/PLO letter application.

In light of the request of the United States that the Court defer ruling on the Rule 62 Motion pending the government's decision concerning a Statement of Interest, we respectfully submit that the Court has additional reason to grant Defendants' alternative request for leave to respond to Plaintiffs' unauthorized Rule 62 sur-reply papers, and now allow the PA and PLO until August 10, 2015 by which to do so.

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<sup>1</sup> Plaintiffs' sur-reply papers included two purported expert affidavits and reports.

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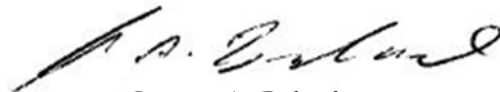
July 27, 2015

Defendants respectfully submit that their Rule 62 Motion should be resolved based on a record in which the PA and PLO can fully address the impact of enforcement of a judgment in this action pending disposition of post-trial motions and pending appeal. Toward that end, Defendants previously requested that the Court solicit the views of the United States concerning the Rule 62 Motion. *See* Dkt. #898, at 13. For those reasons, Defendants respectfully request that the Court agree to the government's request to have until August 10 by which to file a Statement of Interest, if any.

If, as we hope, the Court will defer ruling on the Rule 62 Motion until it hears further from the United States, then it would be equally appropriate to allow the PA and the PLO to respond by August 10 to Plaintiffs' unauthorized Rule 62 sur-reply papers.

Further, if the Court grants the above-described requests of both the United States and the PA and PLO, then the Court may find it more efficient to postpone argument of the Rule 62 Motion pending receipt of any Statement of Interest by the United States, and Defendants' response to Plaintiffs' sur-reply papers. If the Court is inclined to do so—with argument proceeding on other open motions on July 28, as scheduled—then Defendants renew their prior request (Dkt. #932 at 2) to stay entry of the judgment and judgment-execution for the interim period pending rescheduled argument on the Rule 62 Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. A. Baloul", written in a cursive style.

Gassan A. Baloul

cc: All counsel